

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

AMEERA SHAHEED and  
EARL DICKERSON,

Plaintiffs,

V.

C.A. No. 21-01333 CFC

CITY OF WILMINGTON,  
FIRST STATE TOWING, LLC and  
CITY TOWING SERVICES, LLC,

Defendants.

**DECLARATION OF JOHN D. HAWLEY IN SUPPORT OF DEFENDANT  
CITY OF WILMINGTON'S MOTION TO DISMISS THE COMPLAINT**

[illegible]

I, John D. Hawley, declare as follows:

1. I am an attorney with the City of Wilmington Law Department. I make this declaration based on my personal knowledge and in support of Defendant City of Wilmington's Motion to Dismiss the Complaint.
2. Attached hereto as Exhibit A is a true and correct copy of the City Contract for towing and impounding of vehicles for the period of December 1, 2018 through November 30, 2019.

3. Attached hereto as Exhibit B is a true and correct copy of the City Contract for towing and impounding of vehicles for the period of December 1, 2019 through November 30, 2020.

4. Attached hereto as Exhibit C is a true and correct copy of the Ordinance to Authorize and Approve a One Year Extension of Contract 20037FD Between the City of Wilmington and City Towing Services, LLC for the Provision of Towing and Impounding of Vehicles dated November 5, 2020 for the period of December 1, 2020 through November 30, 2021.

5. Attached hereto as Exhibit D is a true and correct copy of the Appeal of Parking Tickets submitted by Ameera Shaheed dated September 17, 2019 and Notification of Parking Violation for tickets WMP11733425 and WMP11733698.

6. Attached hereto as Exhibit E is a true and correct copy of the Appeal of Parking Tickets submitted by Ameera Shaheed dated September 24, 2019 and Notification of Parking Violation for tickets WMP11762754 and WMP11734605

7. Attached hereto as Exhibit F is a true and correct copy of the Appeal of Parking Tickets submitted by Ameera Shaheed dated October 7, 2019 and Notification of Parking Violation for ticket WMP11764610.

8. Attached hereto as Exhibit G1 – G4 are true and correct copies of letters to Ameera Shaheed from the Office of Civil Appeals dated September 27, 2019, September 28, 2019, October 10, 2019 and October 11, 2019 providing the decisions on her appeals.

9. Attached hereto as Exhibit H is a true and correct copy of the Office of Civil Appeals Request to Schedule Court Hearing submitted by Ameera Shaheed dated October 7, 2019.

10. Attached hereto as Exhibit I is a true and correct copy of the Summons and Complaint, Final Disposition and Time to Pay Agreement for Ameera Shaheed.

11. Attached hereto as Exhibit J is a true and correct copy of the Summons and Complaint, Final Disposition and Time to Pay Agreement for Ameera Shaheed.

12. Attached hereto as Exhibit K is a true and correct copy of the Paylock Immobilization and Tow record for Ameera Shaheed.

13. Attached hereto as Exhibit L is a true and correct copy of Parking Violation warning WMP16170441 dated April 9, 2021 for Earl Dickerson's vehicle.

14. Attached hereto as Exhibit M is a true and correct copy of the Parking Violation WMP16176687 and WMP16176679 dated April 19, 2021 for Earl Dickerson's vehicle.

15. Attached hereto as Exhibit N is a true and correct copy of the Wilmington Department of Police Vehicle Release form dated April 22, 2021, for Earl Dickerson's vehicle.

16. Attached hereto as Exhibit O is a true and correct copy of the appeal letter submitted to the City of Wilmington Constitution Services from Earl Dickerson regarding Parking Violation WMP16170441 dated April 29, 2021, and envelope postmarked May 7, 2021.

17. Attached hereto as Exhibit P is a true and correct copy of the letter to Earl Dickerson from the Office of Civil Appeals dated May 12, 2021 providing the decision on his appeal.

18. Attached hereto as Exhibit Q is a true and correct copy of the Immobilization Notice which is adhered to a motor vehicle immobilized/booted for outstanding traffic warrants or parking violations.

I declare under penalty of perjury that the forgoing is true and correct.

**CITY OF WILMINGTON LAW DEPT.**



---

John D. Hawley (#6527)  
Assistant City Solicitor  
Louis L. Redding City/County Bldg.  
800 North French Street, 9<sup>th</sup> Fl.  
Wilmington, DE 19801  
(302) 576-2175  
[jdhawley@wilmingtonde.gov](mailto:jdhawley@wilmingtonde.gov)

Dated: November 29, 2021